

Investigation by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers 03-60;

JOINT PARTIES' FIRST SET OF DISCOVERY REQUESTS TO CLECS

Allegiance Telecom Response, January 2004

JOINT PARTIES-1:

Please state whether you are either an incumbent local exchange provider ("ILEC") providing telecommunications service in the Massachusetts or an affiliate of such an ILEC. If you are an affiliate of an ILEC, please identify the ILEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

Answer:

Allegiance is not, nor is it affiliated with, an ILEC.

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JOINT PARTIES-2:

Please state whether you are either a competitive local exchange carrier ("CLEC") providing telecommunications service in Massachusetts or an affiliate of such a CLEC. If you are an affiliate of an CLEC, please identify the CLEC and describe the affiliation. For purposes of these Requests, "affiliate" shall be as defined in the Communications Act of 1934. Section 3 of the Act defines the term "affiliate" as "a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For the purposes of this paragraph, the term 'own' means to own an equity interest (or the equivalent thereof) of more than 10 percent." 47 U.S.C. § 153(1)

Answer:

Allegiance is a CLEC in Massachusetts. Allegiance is not an affiliate of another CLEC providing telecommunications service in Massachusetts.

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JOINT PARTIES-3:

Do you lease analog voice-grade loops from Verizon to provide local exchange service in Massachusetts? (For purposes of this question, please do not include any DS-0 or voice grade circuits that are part of a T1 circuit or a DS1 or above circuit.)

Answer:

Yes

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JOINT PARTIES-4:

Do you use non-ILEC switches to provide local exchange service to
Massachusetts customers via analog voice-grade loops? (For purposes of this
question, please do not include any DS-0 or voice grade switched circuits that are
part of a T1 circuit or a DS-1 or above circuit.)

Answer:

Allegiance uses its own switch to provide local exchange service to Massachusetts
customers.

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JOINT PARTIES-5:

To the extent that you have not already provided this information in response to the Department's Information Requests, please provide the following information for each switch owned by you that you use to provide local exchange service to Massachusetts customers

- a. the 8-digit common language location identifier ("CLLI") code as it appears in the Local Exchange Routing Guide ("LERG");
- b. street address, city and zip code;
- c. currently equipped line side capacity in
 - i. DS-0/voice grade circuits and
 - ii. DS-1 circuits;
- d. currently utilized line side capacity in
 - i. DS-0/voice grade circuits and
 - ii. DS-1 circuits;
- e. current switch processor capacity in CCS;
- f. busy hour and busy season utilized switch processor capacity in CCS;
- g. function of the switch (e.g., stand-alone, host, or remote, other [e.g. DLC node with no intelligence and/or no or limited switching capability]).

Answer:

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JOINT PARTIES-6:

Please provide the following general information regarding any local exchange service that you currently offer to customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits).

- a. Do you currently provide local exchange service to residential customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain [e.g. broadcast or print advertising, telemarketing, direct mail, Internet, etc.].

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Answer:

Allegiance does not have residential customers in Massachusetts. Allegiance is not currently marketing to residential customers.

- b. Do you currently provide local exchange service to business customers in Massachusetts using analog voice-grade loops served by a non-ILEC switch? If so, are you currently advertising this service? Are you currently marketing this service? Please explain.

Answer:

Allegiance does provide exchange service to business customers in Massachusetts. Allegiance is actively pursuing business customers through direct sales methods.

- c. Please provide a description of each of the residential and/or business local exchange products that you currently provide to Massachusetts customers using analog voice grade, non T-1 loops. You may choose to respond by completing the following matrix.

Answer:

Allegiance's products and pricing can be found in Allegiance's End User Communications Services Tariff. This tariff can be accessed at:<http://www.algx.com/pdf/malocal.pdf>.

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JOINT PARTIES-7:

If you offer cable telephony service in Massachusetts, please state:

- a. To what percent of your cable telephony customers do you provide standalone local exchange service (i.e. no broadband, no cable television)? What is the typical or average retail price for this service?
- b. To what percent of your cable telephony customers do you provide local exchange service and broadband service but not cable television service? What is the typical or average retail price for this service?
- c. To what percent of your cable telephony customers do you provide local exchange service and cable television service but not broadband service? What is the typical or average price for this service?
- d. To what percent of your cable telephony customers do you provide local exchange service, cable television service, and broadband service? What is the typical or average price for this service?

Answer:

Allegiance does not offer cable telephony service in Massachusetts.

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JOINT PARTIES-8:

If you are a CLEC offering circuit-switched local exchange service in Massachusetts, for each month or quarter over the most recent 12-month period for which data is available, please provide the following for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis::

- a. The number of newly installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

Answer:

Allegiance does not track ILEC versus CLEC migrations. Data for gross installs for Massachusetts is in the table below:

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JOINT PARTIES-8 (Cont'd)

- b. The number of newly installed business lines served by UNE-P;
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

Answer:

Allegiance Telecom does not currently serve customers through UNE-P in Massachusetts

- c. The number of newly installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits);
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

Answer:

Allegiance does not offer residential services in Massachusetts

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JOINT PARTIES-8 (Cont'd)

- d. The number of newly installed residential lines served by UNE-P.
 - i. Number or percentage of such lines that were migrated from the ILEC's retail service.
 - ii. Number or percentage of such lines that were migrated from a CLEC's retail service.

For lines migrated from a CLEC's retail service, please separately disaggregate whether those customers were migrated from a UNE-L or UNE-P service delivery mechanism.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

Answer:

Allegiance does not offer residential services in Massachusetts.

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JOINT PARTIES-9:

Please provide, for the most recently available point in time (specifying what it is), and for each Verizon wire center in which you offer service (if the data is available), for each CLEC switch through which you offer service (identifying switches by CLLI code), and on a statewide basis, the number for your company of::

- a. Installed business lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches

Answer:

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a) All of the lines reported in the following table are served by the same Allegiance Massachusetts switch: **PROPRIETARY AND CONFIDENTIAL – NOT FOR RELEASE.** This data is from December, 2003.

unbundled analog voice-grade loops

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JOINT PARTIES-9 (Cont'd)

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- b. Installed business lines served by UNE-P;

Answer:

Allegiance Telecom does not currently serve customers through UNE-P in Massachusetts

- c. Installed business lines served by non-circuit switches;

Answer:

None

- d. Installed residential lines served by unbundled analog voice-grade loops (i.e., excluding service offered via UNE-P or via T1 circuits or DS1 or above circuits) served by circuit switches

Answer:

Allegiance does not offer residential services in Massachusetts.

- e. Installed residential lines served by UNE-P;

Answer:

Allegiance does not offer residential services in Massachusetts.

- f. Installed residential lines served by non-circuit switches.

Answer:

Allegiance does not offer residential services in Massachusetts.

If you are unable to provide information responsive to all three geographies, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

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JOINT PARTIES-10:

For each switch your company operates in Massachusetts, , please provide the information requested in TABLES 1A, 1B, and 1C. If you are unable to provide information responsive to all three tables, please provide responsive information to the extent it is available. Please do not include T-1 circuits or loops served via DS1 or above level facilities in your response.

TABLE 1A

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[illegible]

Allegiance serves only business customers in Massachusetts and does not currently offer DSL services. Below are two tables: one shows Allegiance Voice-Only customers in Massachusetts by ILEC wire center, the following shows all Allegiance customers in Massachusetts by ILEC wire center.

[illegible]

² This category includes voice and DSL on the same wire pair (i.e., line sharing and line splitting).

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[illegible]

JOINT PARTIES-11:

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- a. the date(s) on which you installed the switch and began providing local exchange service on the switch;
- b. the geographic area served by the switch compared to the geographic area served by any circuit switches you use to provide local exchange service;
- c. any differences in the technical or operational requirements for the customer to obtain local exchange service from the switch, including customer premises equipment or software (e.g., specialized phone set; availability of computer, cable modem, set top box, need for customer premises battery backup for telephone service), access method (e.g., DSL, cable television, satellite service), provisioning interval.

Answer:

Not Applicable

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JOINT PARTIES-12:

Do your Massachusetts intrastate tariffs limit in any way the availability of your local exchange service products to particular customer segments, either by geography, class of customer, number of lines purchased, or otherwise? If so, please describe the service offering and explain the limitation, including an explanation of the service delivery mechanism by which you offer the product (e.g. UNE-P, UNE-L, non-circuit-switched, etc.).

Answer:

Allegiance's End User Communications Services Tariff states:

Service Areas – The Company's exchange areas, rate classes, and local calling areas are identical to those defined in the tariffs of the New England Telephone and Telegraph Company - Massachusetts serving the same exchange areas as the Company. Where facilities are available, the Company shall provide service in the exchange areas served by New England Telephone and Telegraph Company – Massachusetts, the certified ILEC within the Company's service areas as reflected herein.

Availability: -- Service available where facilities permit

Exchange areas currently served can be found in section 1.1.1 and 1.1.2 of the Tariff at: <http://www.algx.com/pdf/malocal.pdf>

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JOINT PARTIES-13:

Please explain whether you currently have in place application-to-application, electronically integrated systems that can accomplish, on an automated, flow-through basis (i.e. no manual intervention is required for completion of the migration), migrations between each of the following service configurations: 1) VZ voice only; 2) VZ voice plus DSL; 3) VZ DSL only; 4) CLEC UNE-P voice only; 5) CLEC switch-based voice only; 6) CLEC line sharing; 7) CLEC line splitting; 8) CLEC DSL only. To the extent possible, please answer by completing the following matrix, indicating "Yes" or "No" in each box.

Answer:

See table below and answer to question 15 below:

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	TO VZ voice only	TO VZ voice plus DSL	TO VZ DSL only	TO CLEC UNE- P voice only	TO CLEC switch- based voice only	TO CLEC line sharin g	TO CLEC line splittin g	TO CLEC DSL only
FROM VZ voice only								
FROM VZ voice plus DSL								
FROM VZ DSL only								
FROM CLEC UNE-P voice only								
FROM CLEC switch- based voice only								
FROM CLEC line sharin g								
FROM CLEC line splittin g								
FROM CLEC DSL only								

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JOINT PARTIES-14:

Please explain whether you have always been able to obtain a customer service record (“CSR”) from Verizon and/or other CLECs for the provision of 1) local exchange voice service on UNE-P; 2) local exchange voice service on UNE loop. If not, please provide a detailed explanation of the reason(s) you did not obtain the CSR.

Answer:

In instances where the customer is currently on UNE-P with Verizon and converting to UNE loop with Allegiance, Allegiance has had serious difficulty obtaining CSRs from Verizon. When trying to pull an electronic CSR for a UNE-P customer, Allegiance typically receives an error message. For CLECS, there are some CLECS that we are unable to obtain CSRs for either UNE-P or voice service on UNE loop.

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JOINT PARTIES-15:

Please explain whether you currently use an electronic automated (i.e., not requiring any manual intervention prior to completion of task) method to interface with Verizon to send or receive each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Answer:

- a. Pre-Order transactions are processed using the Verizon GUI (LSI), however, Allegiance has completed certification testing for an EDI Pre-Order interface to be deployed in the next 6 months.
- b. Allegiance processes all orders electronically today using EDI for LSR for facility based ordering including REQ TYP = A, B, C and J. All returning confirmations, rejects, completions and jeopardy notifications are received and stored electronically. Allegiance also has an industry standard electronic interface for ASR with Verizon.
- c. Electronic interfaces are also in place to process E911, LIDB, CNAM and Number Portability.
- d. Allegiance is currently testing an industry standard interface for Trouble Reporting for Maintenance and Repair.
- e. All Billing is processed via electronic file processing.

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JOINT PARTIES-16:

Please provide a detailed explanation of the electronic method (e.g. EDI, CORBA, etc.) that you currently use to send to or receive from ILECs and/or CLECs each of the following: a) pre-order inquiries; b) orders (including placing the order, firm order confirmations, jeopardy notices, etc.); c) provisioning (including the exchange of information for changes to 911, local number portability, and other databases); d) maintenance and repair; e) billing.

Answer:

Allegiance processes all orders electronically today using EDI for LSR for facility based ordering including REQ TYP = A, B, C, and J. All returning confirmations, rejects, completions, and jeopardy notifications are received and stored electronically. Allegiance also has an industry standard electronic interface for ASR with Verizon. Electronic interfaces are also in place to process E911, LIDB, CNAM, and Number Portability. Allegiance has the internal applications to automatically provision services in to their network. In addition, Allegiance has electronic monitoring tools to manage all network services, trouble-shoot, Test, and repair on their own network. Pre-Order transactions are processed using the Verizon GUI (LSI), however Allegiance has completed certification testing for an EDI Pre-Order interface to be deployed in the next 6 months. Allegiance is currently using the Verizon GUI for Trouble Reporting, Maintenance and Repair. All Billing is managed via electronic file processing.

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JOINT PARTIES-17:

Please explain whether you currently have in place and use electronic automated systems to:

- a. Process orders placed by customers whose service will be provisioned using your own switches.
- b. Provision service for customers using your own switches
- c. Maintain and repair service for customers whose service is provisioned using your own switches.
- d. Conduct trouble isolation and repair for customer services provisioned via your own switches using UNE loops.
- e. Conduct testing for customer services provisioned via your own switches using UNE loops.
- f. Bill customers whose services are provisioned using your own switches.

If with respect to your answer to any of the above subparts your systems are only partially electronic, please identify specifically which portions are electronic, and which are manual, and provide a detailed explanation of the limitations created by the manual portions.

Answer:

See response to Joint Parties-16

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JOINT PARTIES-18:

Please state:

- a. Whether your company has ever applied for Eligible Telecommunications Carrier ("ETC") status in Massachusetts.
- b. If there answer to (a) is yes, please state whether ETC status was granted, the DTE case number in which it was granted, and the date of the order approving the status.

Answer:

Allegiance has not applied for Eligible Telecommunications Carrier ("ETC") status in Massachusetts.